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*Attorney for the Plaintiff*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
[EUGENE DIVISION]

Ian McKay, individually and on behalf of all  
others similarly situated,

*Plaintiff,*

vs.

Willamette Ventures, LLC d/b/a Salem Harley  
Davidson, an Oregon limited liability  
company,

*Defendant.*

CASE NO.: 6:20-cv-00797-MC

**NOTICE OF VOLUNTARY DISMISSAL OF  
ACTION WITH PREJUDICE AS TO THE  
NAMED PLAINTIFF AND WITHOUT  
PREJUDICE AS TO THE PUTATIVE CLASS**

Plaintiff Ian McKay hereby moves to dismiss the above entitled action with prejudice as to the named Plaintiff and without prejudice as to the Putative Class, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii).

WHEREFORE, Plaintiff respectfully requests that this Court dismiss this action with prejudice as to the named Plaintiff and without prejudice as to the Putative Class, pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii).

Date: September 2, 2020

**KAZEROUNI LAW GROUP, APC**

By: /s/ David J. McGlothlin  
David J. McGlothlin, Esq.  
Attorney for the Plaintiff